Juan P. Morillo (pro hac vice)

Gabriel F. Soledad

Daniel Pulecio-Boek

QUINN EMANUEL URQUHART &

SULLIVAN, LLP

1300 I Street, NW, Suite 900

Washington, D.C. 20005

Telephone: (202) 538-8000 Facsimile: (202) 538-8100

Email: juanmorillo@quinnemanuel.com Email: gabrielsoledad@quinnemanuel.com Email: danielpulecioboek@quinnemanuel.com

Eric Winston (pro hac vice)

QUINN EMANUEL URQUHART &

SULLIVAN, LLP

865 South Figueroa Street, 10th Floor

Los Angeles, California 90017 Telephone: (213) 443-3000 Facsimile: (213) 443-3100

Email: ericwinston@quinnemanuel.com

Scott C. Shelley

Samantha Gillespie (*pro hac vice*) QUINN EMANUEL URQUHART &

SULLIVAN, LLP

51 Madison Avenue, 22nd Floor New York, New York 10010 Telephone: (212) 849-7000

Facsimile: (212) 849-7100

Email: scottshelley@quinnemanuel.com Email: samanthagillespie@quinnemanuel.com

Attorneys for the Foreign Representative

## IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

PERFORADORA ORO NEGRO, S. DE R.L. DE C.V., *et al.* 

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 18-11094 (SCC) (Jointly Administered)

## **NOTICE PURSUANT TO 11 U.S.C. § 1518**

The Foreign Representative for Perforadora Oro Negro, S. de R.L. de C.V. ("<u>Perforadora</u>") and Integradora de Servicios Petroleros Oro Negro, S.A.P.I. de C.V. ("<u>Integradora</u>," and together with Perforadora, the "<u>Debtors</u>"), hereby files this notice pursuant to 11 U.S.C. § 1518 (the "<u>Notice</u>").

- 1. On May 16, 2019, the Debtors learned that the *Concurso* Court presiding over the foreign main proceeding issued an order, dated May 15, 2019, requiring Perforadora to turn over to the Singaporean special purpose entities (i.e., Oro Negro Primus, Pte. Ltd.; Oro Negro Laurus, Pte., Ltd.; Oro Negro Fortius Pte. Ltd.; Oro Negro Decus, Pte. Ltd.; and Oro Negro Impetus, Pte., Ltd.; together the "Singapore Rig Entities") within 24 hours the five offshore drilling platforms (the *Primus, Laurus, Fortius, Decus*, and *Impetus*, together the "Jack-Up Rigs"). The May 15, 2019 order is attached at Exhibit 1.
- 2. The Debtors, reserving all legal rights and without waiving any defenses or objections, have complied with the *Concurso* Court's May 15, 2019 order.

[Signature page follows]

Dated: May 21, 2019

New York, New York

## QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Scott C. Shelley

Scott C. Shelley

Samantha Gillespie (*pro hac vice*) 51 Madison Avenue, 22nd Floor

New York, NY 10010 Telephone: 212-849-7000 Facsimile: 212-849-7100

Email: scottshelley@quinnemanuel.com Email: samanthagillespie@quinnemanuel.com

Juan P. Morillo (pro hac vice)

Gabriel F. Soledad Daniel Pulecio-Boek

1300 I Street, NW, Suite 900

Washington, D.C. 20005 Telephone: (202) 538-8000

Facsimile: (202) 538-8100

Email: juanmorillo@quinnemanuel.com Email: gabrielsoledad@quinnemanuel.com Email: danielpulecioboek@quinnemanuel.com

Eric Winston (pro hac vice)

865 South Figueroa Street, 10th Floor

Los Angeles, California 90017 Telephone: (213) 443-3000 Facsimile: (213) 443-3100

Email: ericwinston@quinnemanuel.com

Sara C. Clark (pro hac vice)

711 Louisiana Street, Suite 500

Houston, Texas 77002

Telephone: (713) 221-7000 Facsimile: (713) 221-7100

Email: saraclark@quinnemanuel.com

Attorneys for the Foreign Representative